



## NATIONAL LOW INCOME HOUSING COALITION

Diane Yentel, President  
**Board of Directors**

Marla Newman, Chair  
Winston-Salem, NC

Dara Baldwin  
Washington, DC

Russell "Rusty" Bennett  
Birmingham, AL

Emma "Pinky" Clifford  
Pine Ridge, SD

Yanira Cortes  
Toms River, NJ

Lot Diaz  
Washington, DC

Chris Estes  
Washington, DC

Daisy Franklin  
Norwalk, CT

Dora Leong Gallo  
Los Angeles, CA

Deidre "DeeDee" Gilmore  
Charlottesville, VA

Aaron Gornstein  
Boston, MA

Moises Loza  
Alexandria, VA

Erhard Mahnke  
Burlington, VT

Rachael Myers  
Seattle, WA

Karlo Ng  
San Francisco, CA

Ann O'Hara  
Boston, MA

Chrishelle Palay  
Houston, TX

Robert Palmer  
Chicago, IL

Eric Price  
Washington, DC

Shalonda Rivers  
Opa-Locka, FL

Nan Roman  
Washington, DC

Shauna Sorrells  
Kensington, MD

Michael Steele  
New York, NY

Martha Weatherspoon  
Clarksville, TN

Sim Wimbush  
Richmond, VA

Founded in 1974 by  
Cushing N. Dolbear

September 12, 2019

Submitted via [www.regulations.gov](http://www.regulations.gov)

Program Design Branch

Program Development Division

Food and Nutrition Service

United States Department of Agriculture

3101 Park Center Drive

Alexandria, VA 22302

Re: FNS Docket No. FNS-2018-0037, RIN 0584-AE62, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)

The following comments are submitted on behalf of the National Low Income Housing Coalition (NLIHC) in response to the Food and Nutrition Service's (FNS) Proposed Rule to express our strong opposition to the changes regarding broad-based categorical eligibility (BBCE) for the Supplemental Nutrition Assistance Program (SNAP), published in the Federal Register on July 24, 2019 (FNS Docket No. FNS-2018-0037). Far too many low-income families face severe housing cost-burdens that restrict their ability to afford nutritious food, and SNAP benefits provide critical assistance to ensure these families avoid food insecurity. For this reason, NLIHC opposes this proposed rule and urges FNS to withdraw it in its entirety and ensure that the long-standing use of BBCE for SNAP benefits continues to remain in effect.

The National Low Income Housing Coalition (NLIHC) is solely dedicated to achieving socially just public policy that ensures people with the lowest incomes in the United States have affordable, accessible, and decent homes. NLIHC members include state and local affordable housing coalitions, residents of public and assisted housing, nonprofit housing providers, homeless service providers, fair housing organizations, researchers, faith-based organizations, public housing agencies, private developers and property owners, local and state government agencies, and concerned citizens. While our members include the spectrum of housing interests, we do not represent any segment of the housing industry. Rather, we work on behalf of and with low-income people who receive and those who need federal housing assistance, especially extremely low-income people and people who are experiencing homelessness.

SNAP plays a critical role in helping to provide food security to the lowest-income seniors, people with disabilities, families with children, and other individuals who are most severely impacted by America's affordable rental housing crisis. According to NLIHC's Gap report, there is a national shortage of 7 million affordable and available homes for America's 11 million lowest-income households. Without affordable housing options, more than 71 percent of these households are severely housing cost-burdened, spending over half of their limited incomes on rent and utilities.<sup>1</sup> As a result, many of our nation's lowest-income families face impossible choices between paying for rent and putting nutritious food on their table or meeting their other basic needs. In fact, severely housing cost-burdened families with children spend 35 percent, or \$310, less on food per month than low-income families who are not housing cost-burdened.<sup>2</sup>

SNAP plays a critical role in bridging this divide by supplementing families' food budgets, and the use of BBCE to expand SNAP eligibility extends vital financial assistance to a greater number of low-income households. BBCE allows SNAP administrators to consider expenses that take up a large share of income, including rent and utilities, in determining SNAP eligibility. As a result, states that have adopted these standards are better able to provide housing cost-burdened families the resources they need to afford adequate, nutritious food, despite the high cost of rent.

Rescinding BBCE will restrict low-income families' access to this crucial assistance, further constraining their already tight budgets. If implemented, this proposed rule would deny food assistance to three million low-income people, including 500,000 children currently receiving free school meals. The proposed revision threatens to plunge households already struggling to make ends meet into deeper poverty, directly harming health, education, and economic outcomes.

For this reason, NLIHC stands united with our partners against the proposed revisions to BBCE for SNAP. We urge FNS to immediately withdraw its current proposal and turn its efforts to advancing policies that strengthen, rather than undermine, food security among America's poorest households.

Please feel free to contact Sarah Mickelson, NLIHC Senior Director of Policy at [smickelson@nlihc.org](mailto:smickelson@nlihc.org) for further information.

---

<sup>1</sup> Out of Reach (2019), available at [https://reports.nlihc.org/sites/default/files/oor/OOR\\_2019.pdf](https://reports.nlihc.org/sites/default/files/oor/OOR_2019.pdf)

<sup>2</sup> Joint Center for Housing Studies at Harvard University, The State of the Nation's Housing (2019), available at [https://www.jchs.harvard.edu/sites/default/files/Harvard\\_JCHS\\_State\\_of\\_the\\_Nations\\_Housing\\_2019.pdf](https://www.jchs.harvard.edu/sites/default/files/Harvard_JCHS_State_of_the_Nations_Housing_2019.pdf)